

HOGAN LOVELLS US LLP

Trenton H. Norris (Bar No. 164781)

Designated Counsel for Service

Joseph T. Spoerl (Bar No. 330245)

4 Embarcadero Center, Suite 3500

San Francisco, California 94111

Telephone: (415) 374-2300

Facsimile: (415) 374-2499

trent.norris@hoganlovells.com

joseph.spoerl@hoganlovells.com

Attorneys for K.G

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES BARRETT,

Defendant.

Case No. 1:22-CR-00213-ADA-BAM

**JOINT STIPULATION AND ORDER TO
SEAL DOCUMENTS**

Assigned to: Hon. Ana de Alba

1 Plaintiff United States of America (“USA”), Defendant Charles Barrett (“Defendant”), and
2 K.G., who is identified in the indictment (collectively, “Parties”), by and through their respective
3 counsel, stipulate as follows:

- 4 1. WHEREAS, on August 7, 2023, Defendant moved the Court “to order the government to
5 obtain K.G.’s psychiatric medical records to include prescriptions from 2014 to the present
6 date”;
- 7 2. WHEREAS, on August 10, 2023, USA filed its Motion in Limine Regarding Discovery of
8 Victim’s Mental Health Records (“Motion”) (ECF No. 107);
- 9 3. WHEREAS, on August 22, 2023, the Court scheduled a hearing on USA’s Motion for
10 Monday, September 25, 2023 at 10 a.m., and set the following briefing schedule:
 - 11 • Defendant’s Opposition to Motion (“Opposition”) due September 6, 2023;
 - 12 • USA’s Reply in support of Motion due September 14, 2023 (ECF No. 110);
- 13 4. WHEREAS, on August 30, 2023, and August 31, 2023, counsel for K.G. filed their Notices
14 of Appearance with the Court (ECF Nos. 114, 115);
- 15 5. WHEREAS, on September 1, 2021, the Court granted the Parties’ Joint Stipulation and
16 Order to Continue Hearing and Set Briefing Schedule;
- 17 6. WHEREAS, on September 21, 2023, K.G.’s Opposition to Defendant’s Request for Her
18 Mental Health Records was served on defense counsel and USA;
- 19 7. WHEREAS on September 22, 2023, counsel for K.G. electronically transmitted K.G.’s
20 Opposition to Defendant’s Request for Her Mental Health Records to the Court;

21 **NOW, THEREFORE, IT IS HEREBY STIPULATED and AGREED**, by and between the
22 undersigned counsel, that, subject to Court approval:

- 23 1. K.G.’s Opposition to Defendant’s Request for Her Mental Health Records, filed in
24 connection with the criminal prosecution of defendant CHARLES BARRETT, will remain
25 under seal.

1 **IT IS SO STIPULATED.**

2 Respectfully Submitted,

3 Dated: September 22, 2023

4
5 By: /s/ Trenton H. Norris

6 Trenton H. Norris

7 Joseph T. Spoerl

8 *Attorneys for K.G.*

9
10 Dated: September 22, 2023

11 By: /s/ David A. Torres

12 David A. Torres

13 Timothy Hennessey

14 *Attorneys for Defendant*

15 CHARLES BARRETT

16
17 Dated: September 22, 2023

18 By: /s/ Arin C. Heinz

19 Arin C. Heinz

20 Michael G. Tierney

21 *Attorneys for Plaintiff*

22 Assistant United States Attorney

ORDER

Pursuant to the stipulation of the Parties, it is HEREBY ORDERED that:

1. K.G.'s Opposition to Defendant's Request for Her Mental Health Records will remain under seal.

IT IS SO ORDERED.

Dated: September 25, 2023


UNITED STATES DISTRICT JUDGE